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5

6 Attorneys for Chapter 7 Trustee,  
William A. Leonard, Jr.

Electronically Filed: July 23, 2009

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

11 In re ) CASE NO. BK-S-09-22035-LBR (Lead Case)  
12 CONSOLIDATED RESORTS, INC., et )  
al., ) (Jointly Administered with Case Nos.  
13 ) 09-22030 through 09-22043)<sup>1</sup>  
14 Debtor. ) Chapter 7  
15 )  
16 ) Date: N/A  
17 ) Time: N/A  
18 ) Ctrm: LBR - Courtroom 1  
Foley Federal Building  
300 Las Vegas Blvd. South  
Las Vegas, NV 89101  
Judge: Hon. Linda B. Riegle  
)

**DECLARATION OF WILLIAM A. LEONARD, JR. IN SUPPORT OF TRUSTEE'S EX  
PARTE MOTION FOR ORDER AUTHORIZING AND DIRECTING THE JOINT  
ADMINISTRATION OF CASES**

<sup>24</sup> <sup>1</sup> The Debtors in these cases consist of the following: Destinations Unlimited, Case No. 09-22030; Consolidated Realty,  
Inc., Case No. 09-22031; Consolidated Media, LLC, Case No. 09-22032; CRI Travel Holdings, LLC, Case No. 09-  
22033; Consolidated Resorts Travel, LLC, Case No. 09-22034; Consolidated Resorts, Inc., Case No. 09-22035;  
Consolidated Maui, Inc., Case No. 09-22036; Consolidated Kona, Inc., Case No. 09-22037; Lahaina Ticket Company,  
Case No. 09-22038; Soleil PS, LLC, Case No. 09-22039; Soleil LV, LLC, Case No. 09-22040; Consolidated Tahiti, Inc.,  
Case No. 09-22041; Consolidated Orlando, Inc., Case No. 09-22042; and Consolidated Tickets, LLC, Case No. 09-  
22043.

1 I, William A. Leonard, Jr., declare:

2       1. I am a member of the panel of bankruptcy trustees for the District of Nevada. I have  
3 been appointed as the Chapter 7 trustee of the bankruptcy estates of the above-captioned debtors  
4 (“Debtors”).

5       2. I make this declaration in support of my Ex Parte Motion for Order Authorizing and  
6 Directing the Joint Administration of Cases (“Motion”). All terms not defined herein shall have the  
7 meaning given them in the Motion.

8       3. Prior to the Petition Dates, the Debtors were in the business of developing, owning and  
9 operating timeshare and resort properties located in the states of Nevada, Florida and Hawaii.  
10 Among other business activities, the Debtors marketed timeshare interests in their resort properties  
11 for sale to consumers. Consumers who purchased timeshare interests in the Debtors’ properties  
12 often paid for such purchases, in part, by signing and delivering promissory notes to the Debtors for  
13 a portion of the purchase price. The Debtors oversaw the collection of the note receivables, and  
14 these note receivables now represent the vast majority of the bankruptcy estates’ assets. The Debtors  
15 had a workforce in excess of one thousand persons engaged in administration, timeshare marketing  
16 and sales, and the collection of receivables from consumer purchasers of timeshare interests.

17       4. I am informed and believe that the Debtors are “affiliates” as that term is defined in  
18 Bankruptcy Code section 101(2), as they share significant common ownership. Particularly, I am  
19 informed and believe that Consolidated Resorts, Inc. or Soleil LV, LLC -- both of whom are Debtors  
20 herein -- own 100 percent of the stock of most, if not all, of the other Debtors. Additionally, the  
21 Debtors’ businesses were intertwined financially and operationally, with each involved in various  
22 aspect of the timeshare industry, and often transacting with one another. Because of the interrelated  
23 nature of the Debtors’ businesses, I anticipate filing numerous motions and other pleadings which  
24 involve the same or substantially similar facts and circumstances between multiple Debtors.  
25 Accordingly, I believe that joint administration would render the bankruptcy process simpler and  
26 less expensive for all involved, eliminate the need for duplicative filings and mailings, and would  
27 thus be in the best interests of creditors and the bankruptcy estates. It would also ease the  
28 administrative burden on the Court and the clerk’s office.

5. Attached as Exhibit "A" hereto is a true and correct copy of the proposed caption for the jointly-administered cases.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on the 23<sup>rd</sup> day of July 2009, at Las Vegas, Nevada.

/s/ William A. Leonard, Jr.  
William A. Leonard, Jr., Chapter 7 Trustee

**EXHIBIT A**

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